

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

BMW AUTO SALES, INC.

*Plaintiff,*

v.

RED WOLF LOGISTICS, LLC, JOHN  
DOES 1-10 (fictitious names), and ABC  
BUSINESS ENTITIES 1-10 (fictitious  
entities), j/s/a,

*Defendants.*

Hon. Joseph H. Rodriguez, U.S.D.J.  
Hon. Sharon A. King, U.S.M.J.

Case No. 1:21-cv-14647-JHR-SAK

**NOTICE OF MOTION TO  
REMAND PURSUANT TO  
28 U.S.C. § 1447(c)**

TO: United States District Court  
District of New Jersey – Camden Vicinage  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

Marc R. Jones, Esq.  
Cipriani & Werner, P.C.  
155 Gaither Drive, Suite B  
Mount Laurel, NJ 08054  
*Attorney for Defendant, Red Wolf Logistics, LLC*

**PLEASE TAKE NOTICE** that on September 20, 2021, or as soon thereafter as counsel may be heard, Joseph D. Lento, Esq. of Lento Law Group, P.C., attorneys for the Plaintiff, BMW Auto Sales, Inc., will move before the Honorable Joseph H. Rodriguez, U.S.D.J., for an Order pursuant to 28 U.S.C. § 1447(c), remanding this action to the Superior Court of New Jersey in and for the County of Atlantic, and granting attorneys' fees and costs.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the attached Brief and Certification of Counsel with Exhibits in support of this motion.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Fed. R. Civ. P. 78, the undersigned requests that this matter be submitted to the Court for ruling on the papers unless opposition is filed, in which case, oral argument is specifically requested.

A proposed form of Order is annexed hereto.

Respectfully Submitted,

**LENTO LAW GROUP, P.C.**



Dated: August 17, 2021

**JOSEPH D. LENTO, ESQUIRE**

**ATTORNEY ID: 013252008**

**LENTO LAW GROUP, P.C.**

**ATTORNEY ID: 013252008**

**3000 ATRIUM WAY – SUITE 200**

**MOUNT LAUREL, NEW JERSEY 08054**

**(T) (856) 652-2000**

**(F) (856) 375-1010**

**[jdvento@lentolawgroup.com](mailto:jdvento@lentolawgroup.com)**

*Attorney for Plaintiff, BMW Auto Sales, Inc.*